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Counsel to General Electric International, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE WATTSTOCK, LLC,

Debtor.

WATTSTOCK, LLC,

Plaintiff,

v.

ALTA POWER LLC,

*Defendant, Counter-Plaintiff, and
Third-Party Plaintiff,*

v.

WATTSTOCK, LLC,

Counter-Defendant, and

**GENERAL ELECTRIC
INTERNATIONAL, INC., d/b/a GE
POWER SERVICES,**

Third-Party Defendant.

Case No. 21-31488-sgj11V

**Chapter 11
Subchapter V**

Adv. No. 21-03083-sgj

*Removed from the District Court of
Dallas County, Texas, 116th Judicial
District*

Case No. DC-20-08331

**GENERAL ELECTRIC INTERNATIONAL, INC.'S MOTION
FOR RECONSIDERATION OF THE COURT'S
ORDER GRANTING MOTION TO REMAND ACTION BACK TO STATE COURT**

General Electric International, Inc. hereby submits this motion for reconsideration of the Court's *Order Granting Motion to Remand Action Back to State Court* [Docket No. 140]. This motion is filed pursuant to Federal Rule of Civil Procedure 59(e), made applicable through Federal Rule of Bankruptcy Procedure 9023. GE respectfully requests that the Court convert its order granting Alta's motion for remand into a report and recommendation to the district court. The grounds for this motion are fully set forth in the accompanying brief, filed concurrently.

Although Alta Power LLC has not agreed to the requested relief, the parties have agreed to an expedited briefing schedule to facilitate prompt resolution of the motion. The parties have agreed as follows:

- Alta Response in Opposition: Due Monday, April 17, 2023;
- GE Reply: Due Friday, April 21, 2023.

The parties likewise have agreed to promptly schedule an expedited hearing on this motion.

Dated: April 10, 2023

Respectfully submitted,

/s/ Andrew LeGrand
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand
Andrew LeGrand

*Attorney for General Electric
International, Inc.*

CERTIFICATE OF CONFERENCE

I certify that on April 10, 2023, I conferred in good faith with Michael Cancienne, counsel for Alta Power LLC, who indicated that his client opposed the requested relief. Counsel for Alta has agreed to the expedited briefing schedule set forth in the motion accompanying this brief.

/s/ Andrew LeGrand
Andrew LeGrand

*Attorney for General Electric
International, Inc.*